

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Brian Graves, Special Agent, Bureau of Alcohol, Tobacco, Firearms and Explosives, being sworn, deposes and states the following:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and have been so employed since March of 2017. I am currently assigned to the Chicago Group IV within the Chicago Field Division and have been since July 2017. My responsibilities include, but are not limited to, the investigation of Federal firearms and narcotics trafficking and firearm and narcotics offenses, particularly those committed by criminal street gangs. I have received special training in the enforcement of laws concerning firearms trafficking, narcotics trafficking and gang activity. I have also been involved in various types of electronic surveillance, search warrants and debriefing of defendants, witnesses, and informants, as well as others who have knowledge of the trafficking of firearms and narcotics. As part of my current assignment, I have investigated criminal violations of the Gun Control Act to include Title 18, United States Code, Sections 922 and 924.

2. Your affiant states the facts which establish the probable cause necessary for issuance of the criminal complaint are either personally known to me or have been told to me directly by other law enforcement officers with whom I have worked with on this case.

FACTS ESTABLISHING PROBABLE CAUSE

3. As a member of the ATF, I have been assigned to Operation Legend, a federal investigation targeting violations of federal firearms laws in Chicago and the Chicagoland area. I, and my group, have been tasked with the investigation into persons who lie on ATF Form 4473 about their status as legal purchasers of firearms. In the course of that investigation, a person identified as Cliff Derek URBAN became a person of interest based on a large number of firearms that he had purchased, with some of those firearms being recovered by law enforcement.

4. During the course of the investigation, it became apparent that Cliff URBAN purchased a minimum of seven (7) firearms from August 2017 to March 2020, from Cabela's, located in Hammond, Indiana, and Deb's Gun Range, located in Hammond, Indiana, all of which are Federal Firearm Licensed (FFL) gun dealers. Three (3) firearms were recovered by law enforcement in Chicago, Illinois 106 days, 150 days, and 244 days after purchase. One (1) firearm was recovered in Harvey, Illinois 58 days after being purchased.

5. A review of all ATF Form 4473 forms involved in the purchase of firearms revealed that Cliff URBAN completed the forms on the corresponding dates and locations:

<u>Date of Purchase</u>	<u>Location</u>	<u>City</u>	<u>Make</u>	<u>Model</u>	<u>Caliber</u>
8/2/2017	Debs	Hammond, IN	Century Arms Glock	AK63DS 26	7.62x39 9mm

1/27/2018	Debs	Hammond, IN	Glock Century Arms	19 Draco	9mm 7.62x39
10/3/2019	Cabela's	Hammond, IN	Glock Smith&Wesson	43 M&PShield	9mm 9mm
2/26/2020	Cabela's	Hammond, IN	Smith&Wesson	M&PShield	9mm

6. For each of the aforementioned firearm purchases, question number 2 of the ATF Form 4473 forms asked for Cliff URBAN's current state of residence and address. URBAN answered that his current state of residence and address was 5255 Hohman Avenue, Hammond, Indiana.

7. On August 13, 2020, ATF Special Agents Brian Graves, and Grady Murdock went to 5255 Hohman Avenue, Hammond, Indiana to interview Cliff URBAN. Upon arriving to the address, agents observed that 5255 Hohman Avenue, Hammond, Indiana was the Family Resource Center of Lake County. Upon entering the facility, SA Graves spoke with Lakiesha Holman who is a manager of the Family Resource Center of Lake County. Holman stated no one lives at 5255 Hohman Avenue, Hammond, Indiana, and the address of the Lake County Family Resource Center was used for mailing purposes only.

8. If Cliff URBAN would have answered truthfully to question number 2 on the ATF Form 4473 forms on August 2, 2017, January 27, 2018, October 3, 2019, and February 26, 2020, concerning his residence, the federally licensed

firearm dealers would have denied the transaction by law due to URBAN not having valid identification with his current and accurate address.

9. This warrant is being considered electronically via telephone or other reliable electronic means, in accordance with Federal Rules of Criminal Procedure 41(d)(3) and 4.1. Furthermore, this affidavit has been electronically transmitted verbatim to the judge.

CONCLUSION

10. Based upon the information contained in this affidavit, probable cause to believe that on August 2, 2017, January 27, 2018, October 3, 2019, and February 26, 2020, in the Northern District of Indiana, Cliff URBAN

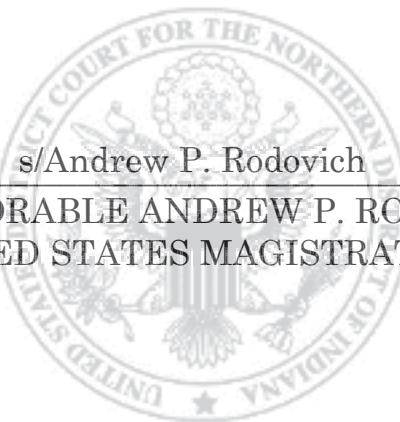
violated Title 18, United States Code, Section 922(a)(6), Making a Material False Statement in the Acquisition of a Firearm.

FURTHER AFFIANT SAYETH NAUGHT.



Brian Graves
SPECIAL AGENT BUREAU OF ALCOHOL,
TOBACCO, FIREARMS AND EXPLOSIVES

This affidavit and accompanying warrant have been transmitted to me electronically and the affiant has verbally attested to the truth and accuracy of the contents via telephone this 1st day of October, 2020.



s/Andrew P. Rodovich
HONORABLE ANDREW P. RODOVICH
UNITED STATES MAGISTRATE JUDGE